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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

PATRICIA WEEKS, ALICIA HELMS, BRIAN
MCCLOY, and ADRIAN ALCARAZ on behalf
of themselves and all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:18-cv-00801-NC

**JOINT CASE MANAGEMENT STATEMENT
AND PROPOSED SCHEDULE**

Date: March 20, 2019

Time: 10 a.m.

Courtroom: 5, 4th Floor

Judge: Hon. Nathanael M. Cousins

Pursuant to the Court's March 1, 2019 Order (Dkt. No. 143) and Local Rule 16-10(d), Plaintiffs Patricia Weeks, Alicia Helms, Brian McCloy, and Adrian Alcaraz, and Defendant Google LLC submit this subsequent joint case management statement and proposed schedule for briefing settlement approval under Federal Rule of Civil Procedure 23(e).

1. Case Developments Following Third Case Management Statement

Since the parties filed their last Case Management Statement on December 5, 2018 (Dkt. No. 110), the parties have completed fact discovery in this case. The parties each responded to multiple sets of interrogatories and document requests. Google produced over 350,000 pages of documents, and Plaintiffs deposed ten Google employees, including one designated under Rule 30(b)(6) to testify regarding 17 topics selected by Plaintiffs, and non-party Verizon. Google completed depositions of all of the named Plaintiffs and also deposed Plaintiffs' experts. On January 23, 2019, Google filed an Opposition to Plaintiffs' Motion for Class Certification. Dkt. Nos. 130-33.

On February 22, 2019, the parties participated in a settlement conference with Magistrate Judge Donna Ryu. Dkt. No. 117. At the settlement conference, the parties reached an agreement in principle regarding the monetary terms of a settlement, which the parties confirmed on February 25, 2019. Dkt. No. 141. In light of the parties' agreement in principle, on March 1, 2019, the Court entered an Order suspending case deadlines to allow the parties to finalize settlement terms and details. Dkt. No. 143. Since then, the parties negotiated and, on March 8, executed a term sheet setting forth the material deal points associated with resolution of this case. The parties will now turn to negotiating and drafting a final settlement agreement, which will include a plan of allocation and a class notice plan.

2. Proposed Schedule

The parties propose the following schedule for briefing preliminary approval of the proposed settlement. Plaintiffs will include with their preliminary approval motion a proposed notice plan and final approval briefing schedule.

Name of Filing or Event	Proposed Deadline
Motion for Preliminary Approval	April 26, 2019
Hearing on Plaintiffs' Motion for Preliminary Approval	May 31, 2019, or as soon thereafter as is convenient for the Court

1 **3. ADR Update**

2 If any disputes arise out of the finalization of the settlement terms and documentation, including
3 the plan of allocation, the parties have agreed that they will present any such disputes to Magistrate
4 Judge Donna Ryu.

5
6 Dated: March 13, 2019

Respectfully submitted,

7 By: /s/ Simon S. Grille
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1 Dated: March 13, 2019

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11 *Attorneys for Defendant Google LLC*

12 **ATTESTATION**

13 Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that concurrence in the filing of this document
14 has been obtained from counsel for Defendant Google LLC.

15 Dated: March 13, 2019

/s/ Simon S. Grille